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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/13/06

June 30, 2006

Honorable Richard J. Holwell
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: Danice B., et al. v. City of New York, et al.
06 Civ. 4674

Dear Judge Holwell:

We represent Orange County, Orange County Department of Social Services, Orange County Child Protective Services, Owen Mercer, Karen Smith, and John Does #1 through 5 who are alleged to be employed by Orange County (collective "Orange County Defendants"), in the above-referenced action.

Our stipulated deadline to respond to the Complaint is July 6, 2006, however your individual rules require a pre-motion conference before a motion to dismiss is submitted. Deputy Clerk William Donald has advised that a pre-motion conference will likely be held during the month of July. Therefore, we request leave from the Court for an extension of time to July 28, 2006 within which to respond. We have attempted to contact Plaintiff's attorney to obtain his consent, but have not been able to reach him.

Very truly yours,

Laura Wong-Pan

LAURA WONG-PAN
Senior Assistant County Attorney

Application Granted. A pre-motion conference shall be held on July 20, 2006 AT 11:00 AM

cc: Brandon Cruz, Esq.
Joseph Koening, Esq.
Brian Tuitt, Pro Se

SO ORDERED

R. J. H.
USDJ
7/10/06

NEXT PTC 07/20/06 AT 11:00AM